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2 **IN THE UNITED STATES DISTRICT COURT**
3 **FOR THE DISTRICT OF MARYLAND**

4 MARYLAND SHALL ISSUE, INC., *et al.*,)
5 *Plaintiffs,*)
6 v.) Case No. 8:21-cv-01736-TDC (L)
7 MONTGOMERY COUNTY, MD.,) Case No. 8:22-cv-01967-DLB
8 *Defendant.*)
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10 **SUPPLEMENTAL DECLARATION OF JOHN SMITH NO.1**

11 COMES NOW, the declarant, JOHN SMITH NO.1, and hereby solemnly declares
12 under penalties of perjury and states that based upon personal knowledge that the contents of the
13 following declaration are true:
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15 1. My name is JOHN SMITH NO.1, and I am member of Maryland Shall Issue,
16 Inc., a plaintiff in the above-captioned matter. This Supplemental Declaration is for the purpose
17 of adding to my prior declaration previously submitted. I am an adult over the age of 18, a
18 Montgomery County Maryland resident and I am fully competent to give sworn testimony in this
19 matter. JOHN SMITH NO. 1 is not my real name. I respectfully request that my identity remain
20 anonymous. While I have provided armed security to my Church, I have done so anonymously
21 and the effectiveness of that security were it occur in the future would be undermined if my role
22 in doing so became public knowledge. Moreover, regretfully, I am concerned that my livelihood
23 would be jeopardized should I be publicly associated with pro-Second Amendment advocacy.
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25 2. I am a Deacon at my Church in Montgomery County and I serve
26 (anonymously) as a volunteer plain-clothed armed security member of my Church located in
27 Montgomery County Maryland with the permission of my pastor and other Deacons. Prior to the
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EXHIBIT C

1 Supreme Court's decision in *NYSRPA v. Bruen* in June of 2022, I obtained a restricted Maryland
2 wear and carry permit from the Maryland State Police for the specified purpose of providing
3 armed security for my Church. I have since been issued an unrestricted wear and carry permit by
4 the State Police.
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6 3. In light of County Council and County Executive for Montgomery County,
7 Maryland enacting bill 21.22E I am no longer able to carry a weapon to my Church in
8 Germantown, MD. I am no longer able to provide protection to my family or other congregants
9 due to the potential penalties related to the bill if I were found in violation of them. Potentially
10 losing my Second Amendment rights for life is a serious threat to me and I cannot afford to take
11 that chance. Because of bill 21-22E, our Church had no choice but to bar all members who had a
12 carry permit from carrying a firearm on Church grounds and during Church activities taking
13 place outside of those grounds.
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15 4. Due to the 100-yard provision and removal of the exception of for Maryland
16 wear and carry permit holders I do not see how I, or any person wishing to practice their Second
17 Amendment rights to bear arms, can move around the County without violating the law. I live in
18 the 20878 zip code. My neighborhood has several parks and an elementary school. Since the
19 law now includes all property of the defined sensitive locations and not just the buildings 100
20 yards/300 feet pretty much covers any road in front of any of the listed locations.
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23 5. There is a path to a park opposite the entrance to the street on which I live. The
24 park path behind the homes across from my street is 100 feet from cross street to my street, so
25 driving anywhere from my home or walking in my neighborhood puts me in violation of this law
26 as soon as I walk to the head of my street. Since I live on a cul-de-sac I have no choice when
27 leaving my home to go that way, forcing me to violate the law if I were to carry my firearm with
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1 my permit. I cannot walk in approximately half of my neighborhood due to the number of parks,
2 the elementary school and the 100 yard/300 feet exclusion zone. If I travel to some local
3 shopping centers it is virtually impossible to carry a firearm with a permit due to the types of
4 sensitive places the County has banned weapons on or near. For example at the Muddy Branch
5 Square Shopping Center on Muddy Branch road, the buildings of the shopping center are
6 roughly shaped in a U configuration with the parking lot filling in the space in front of the stores.
7 There is an urgent care facility on the north end of the shopping center; a County liquor store on
8 the west side; an eye doctor in the southwest corner.

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11 6. Using Google maps measuring tool, I have determined that it is not possible to
12 patronize any store while carrying a firearm with a permit based on the distance rule and the
13 sensitive places as well as entering and exiting the parking lot puts one closer to the sensitive,
14 prohibited places. If I wanted to go to the Kentland's Shopping area in Gaithersburg, MD from
15 my home it is impossible to not violate the newly enacted law as any route I would take there has
16 me pass by any number of parks, places of worship, schools, a library, community health centers,
17 childcare facilities, and/or government buildings including any place owned by or under the
18 control of the County.

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20 /s/ John Smith No. 1

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Dated: December 4, 2023
JOHN SMITH NO.1
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